

## DRAFT DELIBERATIVE

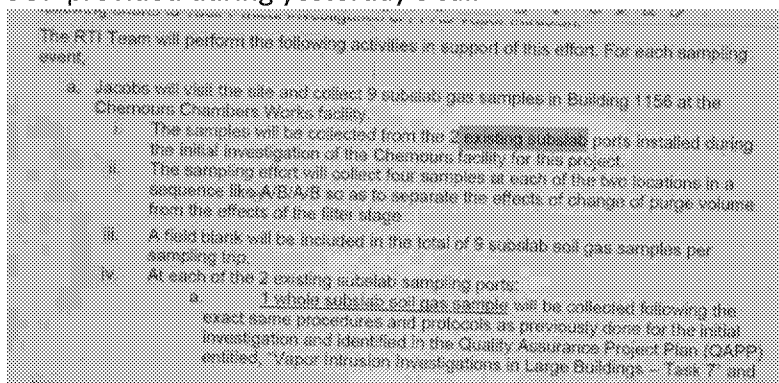
### Comments for the EPA ORD PFAS VI proposal as per the 11-16-2021 TEAMS meeting with EPA-ORD, Chemours, and NJDEP.

#### SOP

##### The PFAS SSSG sampling SOP (ORD)

- will be revised to state the sampling tube will be placed vertically
- the sampling tube packing material content is a proprietary substance but they could disclose that it is in the form of beads not wool
- the filter is a 3 micron quartz microfiber
  - for analysis, the filter will be rolled and put in a clean ADT
  - the syringe will not come in contact with the vapors
- samples will be analyzed by **Eurofin Air Toxics**
  - analytical method is proprietary
  - contains more analytes than **Veritas'** method
  - will set up a call for DEP and EPA with Heidi Hayes, lab manager, to discuss lab performance evaluation
  - next sampling event anticipated to occur December 9 or 10, 2021.

##### SOP provided during yesterday's call



signed 03-12-2021. No new QAPP or QAPP modifications are needed nor should modifications to the health and safety plan be required.

- b. 1 subslab gas sample that has been filtered will be collected. The filter(s) will remove fine particulate matter (PM 2.5) and be selected such that they do not sorb PFAS compounds.
- c. 1 filtered sample where the filter, placed in front of the ATD sampling tube prior to and during sample collection, is analyzed separately for particulate PFAS compounds.
- b. Sample analyses, using modified Method TO-17 (thermal desorption), will include the ATD tubes and filters and occur at the same analytical laboratory (Eurofins Air Toxics) used during the initial investigation at the Chemours facility.
- c. Eurofins Air Toxics will participate in and assist with the development of the filter method used in this task and will provide expert consultation on sampling and analytical issues.
- d. Jacobs (Chris Lutes) will provide quality assurance/quality control (QA/QC) review and approval of all analytical results, ensuring that QAPP specifications and limits are followed and achieved.
- e. Analytical laboratory reports will be submitted to the TOCOR as soon as possible after QA/QC review activities are completed by Jacobs.

#### The PFAS indoor air sampling SOP (Chemours)

- was not revised
- is CBI
- samples collection method OVS, an OSHA validated method
- samples are analyzed by **Veritas**
  - method was developed for DuPont
  - proprietary status of method to be verified